

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RABBI DAVID SLOMOVITZ, NATHAN FRANKEL, EDWARD HANDLER, SAMUEL LANDY, MIRIAM LEVITZ, HARRY LIEBER, DAVID REICH, ABRAHAM TAUBER, and MORRIS WALDMAN,

Plaintiffs,

v.

THE ENCLAVE AT FAIRWAYS HOMEOWNERS ASSOCIATION, INC., a New Jersey Domestic Corporation,

Defendant.

Civil No. 3:18-cv:16910

Returnable: April 1, 2019

DECLARATION OF ROMAN P. STORZER

Roman P. Storzer declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an attorney with Storzer & Associates, P.C., attorneys for the Plaintiffs and make this Declaration in support of the application of Plaintiffs to recover legal fees against Defendant.
2. This Declaration is based on my own personal knowledge.
3. I am a duly licensed attorney at law and a member in good standing of the bars of the following courts:

Court	Admission Date
United States Supreme Court	5/2/2000
Second Circuit Court of Appeals	4/20/2005
Third Circuit Court of Appeals	6/7/2002
Fourth Circuit Court of Appeals	11/14/2011
Sixth Circuit Court of Appeals	10/18/2000
Seventh Circuit Court of Appeals	6/21/2002
Ninth Circuit Court of Appeals	5/29/2002
Tenth Circuit Court of Appeals	9/12/2002
United States District Court for the Western District of Michigan	3/22/2000
United States District Court for the Northern District of Illinois	7/22/2003
United States District Court for the District of Maryland	3/23/2007
United States District Court for the District of Columbia	5/5/2003
State of Maryland Courts	12/19/1996
District of Columbia Courts	11/27/1998

4. I graduated with honors from the George Washington University Law School in 1996.

5. I have significant experience with respect to litigating religious freedom cases. I was the Director of Litigation for the nonprofit organization The Becket Fund for Religious Liberty, and supervised several attorneys in religious rights litigation, after which I have represented many religious organizations in such matters in private practice since 2004. I have co-authored law review articles on RLUIPA issues titled “Christian Parking, Hindu Parking: Applying Established Civil Rights Principles to RLUIPA’s Nondiscrimination Provision,” Richmond J. of L. & Pub. Interest (2013), and “The Religious Land Use and Institutionalized Persons Act Of 2000: A Constitutional Response to Unconstitutional Zoning Practices,” George Mason L. Rev. (2001).
6. I have worked on this litigation since its inception with respect to all aspects of the same, including preparation of pleadings and the Consent Order, although I did not appear in Court with respect to the hearing on same.
7. My services in this litigation were billed out at \$400.00 per hour. This is lower than my rate of \$450.00 per hour for other clients in similar matters in the region.
8. Throughout the course of this litigation I maintained contemporaneous time records of my services rendered on behalf of Plaintiffs. **Exhibit A** contains a listing of those records performed in this matter. The hourly rate applicable at the time and total value of such timeslips are also included.
9. I have reviewed the detailed time and billing records maintained and submitted as **Exhibit A**. I certify my records in Exhibit A to be accurate and true and that they were incurred with respect to providing legal services only for this case for the period as indicated thereon.
10. A copy of the fee agreement with each of the Plaintiffs are attached hereto as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 8, 2019

/s/ Roman P. Storzer
Roman P. Storzer